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September 14, 1998

U.S. Department of Transportation Dockets  
Docket No. **FAA-98-4390-2**  
400 Seventh St., SW, Rm. Plaza 401  
Washington, DC 20590

Dear FAA Rule Making Review Board:

The Notice of Proposed Rule Making(NPRM) that changes Flight Plan requirements for helicopter operations under instrument flight rules is long overdue and much needed. The rule would provide an increased level of safety by encouraging pilots to utilize the IFR system when marginal weather exists. Additionally, we would greatly improve the productivity of our helicopter with the ability to fly **IFR** more frequently when the weather has deteriorated. Since flying IFR requires higher flight altitudes than marginal VFR allows, there would be much less of a noise impact on local communities and neighborhoods when this rule is implemented.

Essentially, nothing but good can come from enacting this rule which recognizes the unique characteristics of helicopter operations. This rule should be just the beginning of changes in the way helicopters are allowed to operate within the air traffic system helping to free up some of the congestion with better efficiency.

Sincerely,

Cindy Wilson  
Chief Pilot, Rotor Wing